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Attorneys for Defendants
SONY COMPUTER ENTERTAINMENT AMERICA LLC and
SONY CORPORATION OF AMERICA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

CORELLE WALKER, individually and on behalf
of all others similarly situated,

Plaintiff,

v.

SONY COMPUTER ENTERTAINMENT
AMERICA LLC, a Delaware Limited Liability
Company; SONY COMPUTER
ENTERTAINMENT AMERICA, INC., a
Delaware Corporation; and SONY
CORPORATION OF AMERICA, a New York
Corporation,

Defendants.

Case No. 3:11-cv-02277-MEJ

**STIPULATION TO EXTEND
TIME FOR DEFENDANTS TO
MOVE, ANSWER, OR
OTHERWISE RESPOND TO
COMPLAINT**

Judge: Magistrate Judge Maria-Elena
James

1 WHEREAS, defendants Sony Computer Entertainment America LLC, f/k/a Sony
2 Computer Entertainment America, Inc. ("SCEA") and Sony Corporation of America ("SCA"), as
3 well as certain related entities (collectively, the "Sony Defendants"), have been named as
4 defendants in at least nineteen (19) putative class action lawsuits within this District, to date
5 (collectively, the "N.D. Cal. Sony Litigations");

6 WHEREAS, certain of the Sony Defendants have also been named as defendants in at
7 least fourteen (14) putative class action lawsuits pending outside this District, to date, including at
8 least five (5) suits in the Central District of California, one (1) suit in the Southern District of
9 California, one (1) suit in the Southern District of New York, one (1) suit in the Eastern District
10 of New York, one (1) suit in the District of Massachusetts, one (1) suit in the Eastern District of
11 Michigan, two (2) suits in the Southern District of Texas, one (1) suit in the District of
12 Connecticut, and one (1) suit in the Southern District of Florida (collectively, with the N.D. Cal.
13 Sony Litigations, the "U.S. Sony Litigations");

14 WHEREAS, a motion is currently pending before the Judicial Panel on Multidistrict
15 Litigation (the "JPML") to centralize this and other matters, to which one response has been filed
16 to date, and as to which other responses, including Sony Defendants' response, are due by June 2,
17 2011.

18 WHEREAS, the current deadline for SCEA to respond to the Complaint is May 31, 2011;

19 WHEREAS, the parties have agreed to the extension of time herein for the defendants in
20 the above-captioned action to move, answer, or otherwise respond to the Complaint, in order to
21 facilitate the scheduling of this matter in coordination with the schedule for the motion before the
22 JPML;

23 NOW, THEREFORE, pursuant to Civil Local Rules 6-1(a), 7-1(a), and 7-12, all parties,
24 by and through their respective counsel, hereby stipulate as follows:

25 The deadline for the defendants to respond to the Complaint in the above-captioned action
26 is extended until and including 30 days after a consolidated complaint is filed in a multidistrict
27 litigation centralizing the above-captioned action with other matters, or if centralization is denied
28 by the JPML, then 30 days from the date of such order denying centralization.

1
2 Dated: May 16, 2011

FRANCIS M. GREGOREK
BETSY C. MANIFOLD
WOLF HALDENSTEIN ADLER FREEMAN &
HERZ LLP

5 By: /s/ Betsy C. Manifold /s/ [as authorized]
6 Betsy C. Manifold

7 Attorneys for Plaintiff
CORRELLE WALKER

8
9 Dated: May 16, 2011

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THAD A. DAVIS
ROCKY C. TSAI
ROPES & GRAY LLP

12 By: /s/ Rocky C. Tsai /s/
13 Rocky C. Tsai

14 Attorneys for Defendants
15 SONY COMPUTER
16 ENTERTAINMENT AMERICA LLC
and SONY CORPORATION OF
AMERICA

17 ~~PROPOSED~~ ORDER

18 PURSUANT TO STIPULATION, IT IS SO ORDERED.

19
20 Dated: May 17, 2011

21 By: 
22 U. S. District Court Magistrate Judge